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Counsel for Defendants
Chicago Bridge & Iron Company N.V.,
Philip Asherman, Ron Ballschmiede and
Westley Stockton

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE CHICAGO BRIDGE & IRON)	CASE NO. 1:17-CV-1580 Hon. Lorna Schofield
COMPANY N.V. SECURITIES)	
LITIGATION)	
)	

**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS'
MOTION IN LIMINE NO. 5**

Defendants Chicago Bridge & Iron Co. N.V. (“CB&I”), Philip K. Asherman, Ronald A. Ballschmiede, and Westley S. Stockton submit this Memorandum of Law in support of their Motion *in Limine* No. 5 to preclude any mention of Defendants’ attorneys’ law firm or any mention of “in-house” lawyers who are associated with Defendants. This includes but is not limited to references to the size of the law firm, to the number of attorneys at the law firm, or to the number of attorneys on this particular case.

Such information is irrelevant to the issues before the Court, and any probative value of such evidence is substantially outweighed by the danger of unfair prejudice, confusion of the

issues, misleading the jury, or by considerations of undue delay. *See* FED. R. EVID. 401, 402, 403; *see also Blue Cross & Blue Shield of New Jersey, Inc. v. Philip Morris, Inc.*, No. 98 CV 3287 (JBW), 2000 WL 1805359, at *2 (E.D.N.Y. Dec. 11, 2000) (granting motion *in limine* “to exclude references to the Law Firms Representing Defendants, and to Such Law Firms’ Attorneys, Paralegals, and Other Staff Members”).

Dated: December 13, 2021

Respectfully submitted,

BAKER BOTTS L.L.P.

By: /s/ David D. Sterling

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